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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UGANDA KNAPPS,
Plaintiffs,
vs.
CITY OF OAKLAND, et al,
Defendants.

) CASE NO C05-2935 MEJ
)
)
) STIPULATION AND [PROPOSED] ORDER
) EXTENDING DEADLINES FOR
) COMPLETION OF FACT AND EXPERT
) DISCOVERY
)
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2 WHEREAS, the parties believe that a significant amount of additional fact discovery
3 will need to be completed in order to be able to comply with the F.R.C.P. 26 expert witness
4 disclosure requirements and that it is unlikely that the remaining discovery can be completed
5 sufficiently in advance of the current July 17, 2006 expert disclosure deadline;

6 WHEREAS the parties believe that expert witness disclosure and discovery should
7 proceed following the completion of fact discovery so that the parties' respective experts may
8 be able to fully comply with the F.R.C.P. 26 expert report requirements; and

9
10 WHEREAS the parties have worked cooperatively heretofore in the discovery process
11 heretofore and anticipate that they will be able to complete the fact and expert discovery by
12 the proposed deadlines in this Stipulation so that the completion of the discovery will not
13 interfere with the parties' ability to comply with the other deadlines set forth in the Case
14 Management Order,

15
16 THE PARTIES, BY AND THROUGH THEIR RESPECTIVE COUNSEL OF
17 RECORD, DO HEREBY STIPULATE AND AGREE AND RESPECTFULLY REQUEST
18 THAT the deadlines set forth in the Court's Case Management Order be modified as follows:

19 1. Fact discovery cut-off: September 8, 2006, with the depositions of Sgt. Kelly,
20 Officers Cardoza, Rojas, OPD "persons most knowledgeable" and the plaintiff to be
21 completed in August 2006;

22 2. Expert witness disclosure and disclosure of expert witness reports: October 13,
23 2006;

24 3. Rebuttal expert witness disclosure: October 23, 2006;

25 4. Expert witness discovery cut-off: November 30, 2006.

26
27 STIPULATION AND ORDER RE: EXTENDING
28 DEADLINES FOR FACT/EXPERT DISCOVERY C05-2935 MEJ 2

1 All other deadlines set forth in the Court's Case Management Order will remain the
2 same, including the dates for the trial, pretrial and preparation of trial documents.

3 IT IS SO STIPULATED:

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5 Dated: June 9, 2006

s/s
JULIE M. HOUK
Attorney for Plaintiffs

6
7 Dated: June 9, 2006

s/s
ARLENE ROSEN
Attorney for Defendants

8 PURSUANT TO STIPULATION,
9 IT SO ORDERED:

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11 Dated: June 14, 2006

